

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

M CORP DBA 11:59,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:24-cv-1823
)	
INFINITIVE, INC., et al.)	
)	
<i>Defendants.</i>)	
)	

**CONSENT MOTION OF THE PARTIES TO EXTEND TIME TO RESPOND TO THE
FIRST AMENDED ANSWER AND COUNTERCLAIMS**

COMES NOW Plaintiff/Counterclaim Defendant M Corp DBA 11:59 (“11:59”), and Counterclaim Defendant Alison Moye (“Moye”) by their undersigned joint counsel with the consent of Defendant/Counterclaim Plaintiff Infinitive, Inc. (“Infinitive”), to move for an extension of time to respond to Infinitive’s First Amended Answer and Counterclaims for the reasons set forth below:

1. Moye is a new party to this litigation, originally initiated by a Verified Complaint on October 15, 2024. Moye was added as a party by way of Infinitive’s Counterclaims, filed on May 23, 2025. Moye was served with summons on May 28, 2025.
2. Moye has retained the undersigned counsel for 11:59, her employer, to represent her in this litigation.
3. Moye’s response to the Counterclaims is due on June 18, 2025.
4. 11:59’s response to the Counterclaims is due on June 13, 2025.
5. 11:59 and Moye request an extension of time to June 27 to respond to Infinitive’s First Amended Answer and Counterclaims.

6. The request is made to enable counsel for 11:59 and Moye to confer with Moye and conduct due diligence in preparation of her response to Infinitive's First Amended Answer and Counterclaims and align the due dates for the convenience of the parties.

7. Counsel for Counterclaim Defendants 11:59 and Moye and Defendant/Counterclaim Plaintiff Infinitive have fully discussed the requested extension, and Infinitive has consented to the request.

8. Counsel for all other parties have been consulted and consent to the motion.

9. The request is not made for purposes of delay and will not delay the case or cause prejudice to any party.

10. All parties waive hearing.

For the foregoing reasons 11:59 and Moye request that this Motion be granted.

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Alison Moye*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on this 2nd day of June 2025, a true and correct copy of

the foregoing was served by electronic mail on the following:

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